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APR 21 2025

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

CIDIA MARLENY LIMA LOPEZ,
a/k/a "Sofia,"
a/k/a "Sofia de Torrez Landa,"
a/k/a "alonzodaymelin@gmail.com,"
VERONICA MARIBEL LIMA
LOPEZ,
a/k/a "Verito,"
a/k/a "Vero,"
OTTONIEL CASTRO ARGUETA,
a/k/a "Otto Castro,"
a/k/a "Mauricio Perez Penarosa,"
a/k/a "Clave77,"
ARIZ OBDULIO ARGUETA,
a/k/a "Clave7,"
PEDRO CUCUL GUALNA,
a/k/a "GuateFC.502,"
CARLOS ENRIQUE RAMOS
CAAL,
a/k/a "Carlos Ramos Peten,"
ESVIN ALEXANDER
RODRIGUEZ LUIS,
a/k/a "Esbin Alexander Rodriguez
Luis,"
CESAR RODOLFO GARCIA
ARGUETA,

Defendants.

Case No. 25 CR 140 - JDR

FILED UNDER SEAL

INDICTMENT

[COUNT ONE: 8 U.S.C.
§§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(i),
(ii), (iii), and (a)(1)(B)(i) –
Conspiracy to Bring, Transport, and
Harbor Aliens in the United States
Illegally for Private Financial Gain;
COUNTS TWO through SIX: 18
U.S.C. § 1957(a) – Engaging in
Monetary Transactions in Property
Derived from Specified Unlawful
Activity;
Forfeiture Allegation: 8 U.S.C.
§ 1324, 18 U.S.C. § 982(a) and 28
U.S.C. § 2461 – Human Trafficking
and Money Laundering Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE
[8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(i), (ii), (iii),
and (a)(1)(B)(i)]

INTRODUCTION

At all times relevant to this Indictment:

1. The Lima Lopez transnational criminal organization (“Lima Lopez TCO”) has been operating for at least four years and specializes in bringing aliens from Guatemala, Mexico, Colombia, and other countries in Central America, South America, and Asia into the United States in violation of the law. The Lima Lopez TCO also specializes in the transportation and movement of those aliens illegally within the United States, and the harboring of those aliens illegally within the United States. The aliens are not United States citizens and do not have prior official authorization from the United States government to come to, enter, and reside in the United States. The Lima Lopez TCO brings aliens into the United States illegally, then transports and harbors aliens illegally in the United States in exchange for the aliens’ payment of fees for the financial gain of the Lima Lopez TCO.

2. The locations the Lima Lopez TCO transports, moves, conceals, and harbors those aliens illegally within the United States include the Northern District of Oklahoma, Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Indiana, Illinois, Kansas, Kentucky, Maryland, Michigan, Missouri, Nebraska, New Jersey, New Mexico, New York, North Carolina, Oregon, Pennsylvania, South Carolina, Tennessee, Virginia, and Washington.

3. **CIDIA MARLENY LIMA LOPEZ**, a/k/a “Sofia,” a/k/a “Sofia de Torrez Landa,” a/k/a “alonzodaymelin@gmail.com,” is the leader of the Lima Lopez TCO. **C. LIMA LOPEZ** is a citizen and national of Guatemala and is illegally and unlawfully in the United States.

4. **C. LIMA LOPEZ** works with others, including the following:

- a. Associates in Guatemala who accept various forms of payment for aliens to be brought illegally into the United States;
- b. Associates in Mexico who transport, house, and assist aliens in illegally crossing the United States-Mexico border; and
- c. In the United States, a smuggling cell and teams of drivers who harbor and transport aliens illegally in the United States to various cities within the United States, and operate stash houses where aliens are harbored while they are within the United States illegally. These smuggling cells also collect and distribute proceeds derived from bringing aliens into the United States illegally, transporting those aliens within the United States, and harboring those aliens in the United States.

5. **VERONICA MARIBEL LIMA LOPEZ**, a/k/a “Verito,” a/k/a “Vero,” is an organizer who directs and funds transporting and harboring aliens illegally within the United States. **V. LIMA LOPEZ** also directs the collection of proceeds derived from those activities. **V. LIMA LOPEZ** is a citizen and national of Guatemala and is illegally and unlawfully in the United States.

6. **OTTONIEL CASTRO ARGUETA**, a/k/a “Otto Castro,” a/k/a “Mauricio Perez Penarosa,” a/k/a “Clave77,” is an organizer who directs the transportation and harboring of aliens illegally within the United States and the collection of proceeds related to the illegal smuggling of aliens. **CASTRO ARGUETA** also transported and harbored aliens illegally within the United States and the proceeds derived from those activities. **CASTRO ARGUETA** is a citizen and national of Guatemala and is illegally and unlawfully in the United States.

7. **ARIZ OBDULIO ARGUETA**, a/k/a “Clave7,” is an organizer who arranged to bring an alien across the Mexico-United States border illegally and transport that alien to Tulsa, Oklahoma, within the Northern District of Oklahoma, in exchange for a fee. **OBDULIO ARGUETA** also transported proceeds derived from those activities. **OBDULIO ARGUETA** is a citizen and national of Guatemala and is illegally and unlawfully in the United States.

8. **PEDRO CUCUL GUALNA**, a/k/a “GuateFC.502,” was a driver who transported and harbored aliens illegally within the United States and collected proceeds derived from those activities. **CUCUL GUALNA** is a citizen and national of Guatemala and is illegally and unlawfully in the United States.

9. **CARLOS ENRIQUE RAMOS CAAL**, a/k/a “Carlos Ramos Peten,” was a driver who transported and harbored aliens illegally in the United States. **RAMOS CAAL** collected and transferred proceeds derived from those activities. **RAMOS CAAL** also coordinated with co-conspirators to transport aliens illegally within the

United States. **RAMOS CAAL** is a citizen and national of Guatemala and is illegally and unlawfully in the United States.

10. **ESVIN ALEXANDER RODRIGUEZ LUIS**, a/k/a “Esbin Alexander **RODRIGUEZ LUIS**,” assisted **OBDULIO ARGUETA** in collecting fees from an alien for attempting to bring that alien across the Mexico-United States border illegally and transport that alien to Tulsa. **RODRIGUEZ LUIS** is a citizen and national of Guatemala and is illegally and unlawfully in the United States.

11. **CESAR RODOLFO GARCIA ARGUETA** assisted **OBDULIO ARGUETA** in collecting fees for attempting to bring an alien across the Mexico-United States border illegally and transport that alien to Tulsa. **GARCIA ARGUETA** is a citizen and national of Guatemala and is illegally and unlawfully in the United States.

OBJECTS OF THE CONSPIRACY

12. From in or about October 2021 through the date of this Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **C. LIMA LOPEZ**, **V. LIMA LOPEZ**, **CASTRO ARGUETA**, **OBDULIO ARGUETA**, **CUCUL GUALNA**, **RAMOS CAAL**, **RODRIGUEZ LUIS**, and **GARCIA ARGUETA**, and others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to:

a. Bring aliens to the United States in any manner whatsoever at a place other than a designated port of entry and place other than as designated by the

Secretary of the Department of Homeland Security, for private financial gain, knowing that such persons are aliens and regardless of whether such aliens had received prior official authorization to come to, enter, and reside in the United States, and regardless of any future official action which may be taken in respect to such aliens, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i) and 1324(a)(1)(B)(i);

b. Transport and move aliens within the United States in furtherance of the aliens' violation of law and for private financial gain, by means of transportation and otherwise, knowing and in reckless disregard of the fact that such aliens had come to, entered, and remained in the United States in violation of the law, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i); and

c. Conceal, harbor, and shield from detection aliens in any place and building, and by any means of transportation, for private financial gain, knowing and in reckless disregard of the fact that such aliens had come to, entered, and remained in the United States in violation of law, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy are being accomplished as follows:

13. Conspirators in Central and South America accept various forms of payment from aliens to be brought into the United States illegally.

14. Conspirators in Central and South America gather aliens to be brought into the United States illegally through Mexico.

15. Conspirators in Mexico transport, house, and assist aliens in crossing the United States-Mexico border illegally into the United States.

16. The conspirators collect, for their own private financial gain and that of the Lima Lopez TCO, the fees and proceeds from bringing aliens into the United States illegally.

17. The conspirators transport aliens who were illegally in the United States to various states and cities, including Tulsa.

18. The conspirators collect, for their own private financial gain and that of the Lima Lopez TCO, the fees and proceeds from transporting aliens who were illegally in the United States.

19. The conspirators harbor and conceal aliens who were illegally in the United States throughout various states and cities.

20. The conspirators collect, for their own private financial gain and that of the Lima Lopez TCO, the fees and proceeds from harboring and concealing aliens who were illegally in the United States.

21. The conspirators collect fees and proceeds in cash and through Zelle, an electronic money transfer service.

22. After collecting fees and proceeds, the conspirators deposit them into and transfer them between various bank accounts, including accounts with JP Morgan Chase and Bank of America.

OVERT ACTS

On or about the following dates, in furtherance of the conspiracy and to accomplish its objects, **C. LIMA LOPEZ, V. LIMA LOPEZ, CASTRO ARGUETA, OBDULIO ARGUETA, CUCUL GUALNA, RAMOS CAAL, RODRIGUEZ LUIS**, and others known and unknown to the Grand Jury, committed various overt acts within the Northern District of Oklahoma, and elsewhere, including the following:

23. On May 24, 2022, **OBDULIO ARGUETA** transported approximately \$35,377 in proceeds derived from bringing, transporting, and harboring aliens illegally in the United States, all at the direction of **C. LIMA LOPEZ** and other co-conspirators.

24. In November 2022, **CASTRO ARGUETA** harbored, concealed, and transported five aliens illegally within the United States from Oklahoma to California in exchange for a total fee of approximately \$35,500, all at the direction of **C. LIMA LOPEZ** and other co-conspirators.

25. On November 9, 2022, **CASTRO ARGUETA** transported approximately \$38,125 in proceeds derived from bringing, transporting, and harboring aliens illegally in the United States, all at the direction of **C. LIMA LOPEZ** and other co-conspirators.

26. On November 9, 2022, **CASTRO ARGUETA** harbored, concealed, and transported D.S.A., an alien known to the Grand Jury, within the state of Arizona while D.S.A. was illegally in the United States.

27. On April 10, 2023, **RAMOS CAAL** advised **V. LIMA LOPEZ** about fees collected from A.P., P.R., J.T., V.G., P.Y., J.C., J.C., and M.M., aliens known to the Grand Jury who were illegally in the United States and transported to Tennessee, Alabama, and Florida.

28. On April 10, 2023, **RAMOS CAAL** advised **V. LIMA LOPEZ** about an outstanding fee related to K.R., an alien known to the Grand Jury who was illegally in the United States and transported to Kansas.

29. From April 13, 2023, through June 7, 2023, **RAMOS CAAL** and **V. LIMA LOPEZ** arranged to transport aliens illegally in the United States and collect fees from those transports.

30. On June 24, 2023, **C. LIMA LOPEZ** arranged for **RAMOS CAAL** to transport F.P.X., F.C.P., D.A.P.G., and M.C.J., aliens known to the Grand Jury who were illegally in the United States, to Tennessee, Georgia, and Alabama in exchange for fees.

31. On July 26, 2023, **RAMOS CAAL** transported F.A.M.P., a Colombian national known to the Grand Jury who was illegally in the United States, through California.

32. On December 4, 2023, **CASTRO ARGUETA** and **RAMOS CAAL** arranged to transport M.G., J.S., A.C., S.X., D.T., R.H., M.J., O.C., C.I., E.P., and O.R., aliens known to the Grand Jury who were illegally in the United States, to Florida, Georgia, and Tennessee in exchange for fees.

33. On December 7, 2023, **CASTRO ARGUETA** gave **RAMOS CAAL** an ATM PIN and debit card number x2733 in **C. LIMA LOPEZ**'s name and directed **RAMOS CAAL** to make three deposits totaling approximately \$15,000 into **C. LIMA LOPEZ**'s JPMorgan Chase bank account number x3166.

34. On December 7, 2023, **RAMOS CAAL** used debit card number x2733 to make three ATM deposits totaling approximately \$15,000 into JP Morgan Chase bank account number x3166 belonging to **C. LIMA LOPEZ**.

35. On March 10, 2024, **CUCUL GUALNA** used debit card number x2733 to make three ATM deposits totaling approximately \$17,000 into JP Morgan Chase account number x3166 belonging to **C. LIMA LOPEZ**.

36. From March 11, 2024, through March 13, 2024, **C. LIMA LOPEZ** transferred approximately \$12,540 from JPMorgan Chase Bank account number x3166 into JPMorgan Chase Bank account number x9056, jointly held by **C. LIMA LOPEZ** and **CASTRO ARGUETA**.

37. On May 15, 2024, **C. LIMA LOPEZ** used proceeds in her JPMorgan Chase Bank account number x3166 to purchase a \$45,000 cashier's check payable to T.K., a person known to the Grand Jury.

38. From August 28, 2024, through September 7, 2024, **V. LIMA LOPEZ** arranged with **CUCUL GUALNA** to pick up approximately \$2,000 in proceeds in New Mexico.

39. On August 29, 2024, **CUCUL GUALNA** and **V. LIMA LOPEZ** arranged for **CUCUL GUALNA** to transport aliens illegally in the United States from New Mexico throughout the United States.

40. On September 8, 2024, **V. LIMA LOPEZ** transferred approximately \$584.16 in proceeds to **CUCUL GUALNA** using Barri Money Services for the purpose of transporting aliens illegally in the United States.

41. On September 9, 2024, **CUCUL GUALNA** transported aliens illegally in the United States into Oklahoma.

42. On September 11, 2024, **V. LIMA LOPEZ** arranged with **CUCUL GUALNA** to transport U.C.Q., M.D.L.L.P., Y.A.P., M.A.P., Y.A.M., A.Z.O., P.J.J., and D.S.A.2, aliens known to the Grand Jury who were illegally in the United States, to Washington, California, Oregon, Kansas, and Nebraska in exchange for fees.

43. On October 3, 2024, a conspirator known to the Grand Jury transported C.M., an alien known to the Grand Jury who was illegally in the United States, to North Carolina.

44. On October 10, 2024, **C. LIMA LOPEZ** arranged for **CUCUL GUALNA** to transport aliens who were illegally in the United States to Pennsylvania, New York, New Jersey, Maryland, and Virginia in exchange for fees.

45. On October 13, 2024, **C. LIMA LOPEZ** arranged for **CUCUL GUALNA** to transport A.P.D., an alien known to the Grand Jury who was illegally in the United States, in exchange for a fee.

46. On October 17, 2024, **C. LIMA LOPEZ** arranged for **CUCUL GUALNA** to transport aliens who were illegally in the United States to Kansas, Illinois, Indiana, and Pennsylvania in exchange for a fee.

47. On October 21, 2024, **C. LIMA LOPEZ** arranged for **CUCUL GUALNA** to transport four aliens who were illegally in the United States in exchange for a fee of approximately \$8,000.

48. On October 24, 2024, **CUCUL GUALNA** transported J.A.H.B. and D.F.C.G., Guatemalan and Mexican nationals known to the Grand Jury who were illegally in the United States, and three other aliens who were also illegally in the United States, from Oklahoma through Missouri and Indiana.

49. On October 26, 2024, **CUCUL GUALNA** returned to Oklahoma transporting approximately \$3,151 in proceeds.

50. On November 7, 2024, **C. LIMA LOPEZ** arranged for **RAMOS CAAL** to distribute approximately \$2,000 in proceeds to a driver and approximately \$1,500 in proceeds to **CASTRO ARGUETA**.

51. On November 9, 2024, **C. LIMA LOPEZ** and **RAMOS CAAL** arranged to transport J.A.F. and M.L., aliens known to the Grand Jury who were illegally in the United States, to Oklahoma and harbor them.

52. From November 12, 2024, through November 13, 2024, **C. LIMA LOPEZ** and **RAMOS CAAL** arranged to transport eight aliens who were illegally in the United States from New Mexico to Oklahoma, Georgia, Florida, and other unknown locations.

53. From November 29, 2024, through December 1, 2024, **C. LIMA LOPEZ** and **RAMOS CAAL** arranged for **RAMOS CAAL** to meet with “El Gordo,” a person unknown to the Grand Jury, in New Mexico to pick up eight aliens who were illegally in the United States and transport them in exchange for a fee.

54. On December 2, 2024, **C. LIMA LOPEZ** and **RAMOS CAAL** arranged for **RAMOS CAAL** to transport seven aliens, including five Chinese nationals unknown to the Grand Jury, who were illegally in the United States to Texas in exchange for a fee.

55. On December 14, 2024, **C. LIMA LOPEZ** and **RAMOS CAAL** arranged a trip to New Mexico for the purpose of harboring and transporting aliens illegally in the United States.

56. On December 14, 2024, **C. LIMA LOPEZ** directed **RAMOS CAAL** to pick up funding for the trip to New Mexico from **V. LIMA LOPEZ**.

57. On December 22, 2024, **C. LIMA LOPEZ** and **RAMOS CAAL** arranged to transport aliens illegally in the United States to New Mexico.

58. On December 22, 2024, **C. LIMA LOPEZ** directed **RAMOS CAAL** to pick up funding for the trip to New Mexico from **V. LIMA LOPEZ**.

59. On January 11, 2025, **C. LIMA LOPEZ** arranged for **RAMOS CAAL** to transport R.S., A.L., D.G., N.F., D.R., I.B., J.G., and P.V., aliens known to the Grand Jury who were illegally in the United States, to Mississippi, North Carolina, South Carolina, Florida, Georgia, and Alabama in exchange for a fee.

60. On January 12, 2025, **C. LIMA LOPEZ** provided **RAMOS CAAL** an ATM PIN and directed him to make a cash deposit of approximately \$20,000 in proceeds so she could transfer money to G.M.R., a person unknown to the Grand Jury, for bringing, transporting, and harboring aliens illegally in the United States.

61. On January 12, 2025, **RAMOS CAAL** sent **C. LIMA LOPEZ** a photo receipt of four deposits of approximately \$5,000 in proceeds into JP Morgan Chase bank account x3166 belonging to **C. LIMA LOPEZ**, made using debit card number x2733 in **C. LIMA LOPEZ's** name.

62. From January 12, 2025, through February 3, 2025, **C. LIMA LOPEZ** sent three separate Zelle money transfers totaling approximately \$13,000 in proceeds from

her JPMorgan Chase bank account number x3166 to G.M.R., a person unknown to the Grand Jury.

63. On January 29, 2025, **CASTRO ARGUETA** and **RAMOS CAAL** arranged for **RAMOS CAAL** to transport D.O.R.C., and A.L.G.P., Guatemalan nationals known to the Grand Jury who were illegally in the United States, from New Mexico to Arizona and California.

64. On January 29, 2025, **RAMOS CAAL** transported L.T.G., D.O.R.C., and A.L.G.P., Guatemalan nationals known to the Grand Jury who were illegally in the United States, from New Mexico to Arizona.

65. On March 4, 2025, **OBDULIO ARGUETA** and a person known to the Grand Jury arranged for **OBDULIO ARGUETA** to bring an alien illegally across the Mexico-United States border and transport the alien to Tulsa in exchange for a \$5,000 down payment.

66. On March 4, 2025, **OBDULIO ARGUETA**, **RODRIGUEZ LUIS**, and **GARCIA ARGUETA** collected the \$5,000 down payment in Tulsa to bring an alien illegally across the Mexico-United States border and transport the alien to Tulsa.

67. On March 4, 2025, **OBDULIO ARGUETA**, **RODRIGUEZ LUIS**, and **GARCIA ARGUETA** transported the \$5,000 down payment from Tulsa to Oklahoma City.

68. On March 4, 2025, **GARCIA ARGUETA** deposited proceeds into a Bank of America account in Oklahoma.

69. From June 10, 2024, through January 27, 2025, **C. LIMA LOPEZ** used Zelle to transfer approximately \$20,815 in proceeds from her JPMorgan Chase Bank account number x3166 to **V. LIMA LOPEZ**.

70. From July 18, 2024, through December 31, 2024, **V. LIMA LOPEZ** used Zelle to transfer approximately \$8,301 in proceeds from her Bank of America account number x2066 to **C. LIMA LOPEZ**'s JPMorgan Chase Bank account number x3166.

71. From August 11, 2023, through May 23, 2024, **V. LIMA LOPEZ** used Zelle to transfer approximately \$22,040 in proceeds from her Bank of America account number x2066 to **CASTRO ARGUETA**'s and **C. LIMA LOPEZ**'s joint JPMorgan Chase Bank account number x9056.

All in violation of 8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(i), (ii), (iii), and (a)(1)(B)(i).

COUNTS TWO through FIVE
[18 U.S.C. § 1957(a)]

72. The Grand Jury hereby incorporates and realleges paragraphs 1 through 71 of this Indictment.

73. On or about the dates stated below, in the Northern District of Oklahoma, defendant, **OTTONIEL CASTRO ARGUETA**, a/k/a “Otto Castro,” a/k/a “Mauricio Perez Penarosa,” a/k/a “Clave77,” knowingly engaged in and attempted to engage in monetary transactions, as described below, in criminally derived property of a value greater than \$10,000 and derived from specific unlawful activities, Conspiracy to Bring, Transport, and Harbor Aliens in the United States Illegally for Private Financial Gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(i), (ii), (iii), and 1324(a)(1)(B)(i), as set forth more fully in Count One of this Indictment.

Count	Date	Amount	Bank Account	Location
2	10/23/2023	\$20,000	JPMorgan Chase Bank account number x9056	Broken Arrow, OK
3	10/23/2023	\$15,000	JPMorgan Chase Bank account number x9056	Tulsa, OK
4	01/26/2024	\$15,000	JPMorgan Chase Bank account number x9056	Tulsa, OK
5	02/15/2024	\$31,115.77	Bank of America account number x1349	Broken Arrow, OK

All in violation of Title 18, United States Code, Section 1957(a).

COUNT SIX
[18 U.S.C. § 1957(a)]

74. The Grand Jury hereby incorporates and realleges paragraphs 1 through 71 of this Indictment.

75. On or about May 15, 2024, in the Northern District of Oklahoma, defendant, **CIDIA MARLENY LIMA LOPEZ**, a/k/a “Sofia,” a/k/a “Sofia de Torrez Landa,” a/k/a “alonzodaymelin@gmail.com,” knowingly engaged in and attempted to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and derived from specific unlawful activities, Conspiracy to Bring, Transport, and Harbor Aliens in the United States Illegally for Private Financial Gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(i), (ii), (iii), and (a)(1)(B)(i), as set forth more fully in Count One of this Indictment, by purchasing a cashier’s check from JPMorgan Chase Bank account number x3166 in the amount of \$45,000.

All in violation of Title 18, United States Code, Section 1957(a).

FORFEITURE ALLEGATION
[8 U.S.C. § 1324, 18 U.S.C. § 982(a) and 28 U.S.C. § 2461]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 8, United States Code, Section 1324, Title 18, United States Code, Section 982(a), and Title 28, United States Code, Section 2461.

Upon conviction of the offenses alleged in this Indictment, as a part of their sentences, the defendants, **CIDIA MARLENY LIMA LOPEZ**, a/k/a “Sofia,” a/k/a “Sofia de Torrez Landa,” a/k/a “alonzodaymelin@gmail.com,” **VERONICA MARIBEL LIMA LOPEZ**, a/k/a “Verito,” a/k/a “Vero,” **OTTONIEL CASTRO ARGUETA**, a/k/a “Otto Castro,” a/k/a “Mauricio Perez Penarosa,” a/k/a “Clave77,” **ARIZ OBDULIO ARGUETA**, a/k/a “Clave7,” **PEDRO CUCUL GUALNA**, a/k/a “GuateFC.502,” **CARLOS ENRIQUE RAMOS CAAL**, a/k/a “Carlos Ramos Peten,” **ESVIN ALEXANDER RODRIGUEZ LUIS**, a/k/a “Esbin Alexander Rodriguez Luis,” **CESAR RODOLFO GARCIA ARGUETA**, shall forfeit to the United States, any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations and any property, real or personal, that was used or intended to be used to commit or to facilitate the violations of federal law.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendants shall forfeit substitute property, up to the value

of the forfeitable property described above if, by any act or omission of the defendants, the forfeitable property, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 8, United States Code, Section 1324, Title 18, United States Code, Section 982(a), and Title 28, United States Code, Section 2461.

CLINTON J. JOHNSON
United States Attorney



ADAM D. MCCONNEY
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson
Grand Jury Foreperson